

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RENEE MESSANA, et al.,
Plaintiffs

V.
ACRES OF WILDLIFE CAMPGROUND, INC.,
Defendant

Docket No. 04-11913-MLW

**PLAINTIFF’S PRETRIAL DISCLOSURES PURSUANT TO
FED.R.CIV.P. 26 (a)(3)**

I. WITNESSES PLAINTIFF EXPECTS TO PRESENT

1. Renee Messana
36 Hillside Ave.
Everett, MA
(617) 381-1070
2. Paul Messana
36 Hillside Ave.
Everett, MA
(617) 381-1070
3. Paul DeMeo
4310 W. North B Street
Apt. #19
Tampa, FL 33609
(813) 775-8707
4. Denise DeMeo
4310 W. North B Street
Apt. #19
Tampa, FL 33609
(813) 850-6882
5. Michael Furbish
5 Guard St.

Saugus, MA
(781) 233-1691

6. Josephine Messana
20 Jackson Ave.
Everett, MA 02149
(617) 387-6490
7. Jennifer Lauretti
478 Waltham St.
Newton, MA 02465
(617) 387-2220
8. Keeper of Records
City of Everett, Treasurer's Office
389 Broadway
Everett, MA
9. Ariana Messana
36 Hillside Ave.
Everett, MA
(617) 381-1070
10. Raymond Messana
36 Hillside Ave.
Everett, MA
(617) 381-1070

II. WITNESSES PLAINTIFF MAY CALL IF THE NEED ARISES

1. Michael Baptista
River Meadows
Steep Falls Lake, ME
2. Elaine Baptista Burnham
Acres of Wildlife Campground
Steep Falls Lake, ME

III. WITNESSES WHOSE TESTIMONY IS EXPECTED TO BE PRESENTED BY MEANS OF A DEPOSITION

1. Dr. Mark Varvares
2437 Hermitage Hill Ln.
St. Louis, MO.

(314) 577-8887

IV. DOCUMENTS/EXHIBITS PLAINTIFF EXPECTS TO OFFER

1. Certified Copies of Medical Records from Maine Medical Center for Renee Messana beginning in July, 2002.
2. Certified Copies of Medical Records from Boston Medical Center for Renee Messana beginning in July, 2002.
3. Certified Copies of Medical Records from Dr. Shapur A. Ameri, Boston Regional Medical Center of Renee Messana from September, 2002.
4. Certified Copies of Medical Records from Massachusetts Eye and Ear Infirmary for Renee Messana beginning in January, 2003.
5. Certified Copies of Dental Records from Peter A. Capodiupo, 563 Broadway St. #21, Everett, MA, of Renee Messana beginning October, 2003.
6. Certified Copies of Medical Records from David E. Eisenberg, M.D., 111 Everett Ave. Chelsea, MA of Renee Messana beginning August, 2002.
7. Certified Copies of Medical Records from Jennifer Lauretti, Ph.D., of Renee Messana beginning January, 2005.
8. Copies of all bills/prescriptions relative to injuries Renee Messana sustained in July, 2002.
9. State and Federal Tax Returns for Paul Messana for 2002 and 2003.
10. Photographs of the site leased by the Messanas at Acres of Wildlife Campground taken in July 2002.

Respectfully Submitted,
Plaintiff, by her attorney,

/s/ John W. Collier
John W. Collier, Esq.
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200 Monsignor O'Brien Hwy.
Cambridge, MA 02141
(617) 441-2121 Ext. 2
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CERTIFICATE OF SERVICE

I, John W. Collier, hereby certify that these documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on May 18, 2006.

/s/ John W. Collier
John W. Collier, Esq.